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April 24, 2014

Via ECF

Honorable A. Kathleen Tomlinson
United States Magistrate Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip New York 11722

Re: **Marie A. Cesar v. Meadowbrook Care Center, Inc., et al.**
14 CV 1213 (LDW)(AKT)

Your Honor:

We represent Plaintiff Marie A. Cesar in the above-referenced action. We write now to respectfully request that the Court adjourn the initial pre-trial conference, currently scheduled for April 25, 2014 at 10:00 a.m., to a later date after Defendants have had an opportunity to answer the Complaint. We sincerely apologize to the Court for the late request and notification. Counsel for Defendants, Eve I. Klein, Esq., consents to this request. This is Plaintiff's first request for such an extension.

The reason for this request is that Defendants' time to answer or otherwise respond to the Complaint is due by May 7, 2014. Additionally, the parties have held discussions throughout the week about the possibility of resolving this matter prior to the May 7, 2014 deadline.

Based on the foregoing, Plaintiff respectfully requests that the Court adjourn the initial pre-trial conference to a later date, after the Defendants have had an opportunity to answer.

Thank you for your attention to this matter.

Respectfully submitted,

/s/

Alex Umansky, Esq. (AU7961)

Cc: (Via ECF and E-mail)
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